

**To:** Bennett, Karen[Bennett.Karen@epa.gov]  
**From:** schneeberg, sara  
**Sent:** Thur 2/21/2013 4:19:34 PM  
**Subject:** RE: NPL Project (SW Wyoming- BLM) review of Draft Chapters 2 and 3 - Tim's Preliminary General Conformity Comments

## Ex. 5 - Deliberative Process

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**From:** Bennett, Karen  
**Sent:** Thursday, February 21, 2013 10:49 AM  
**To:** schneeberg, sara  
**Subject:** FW: NPL Project (SW Wyoming- BLM) review of Draft Chapters 2 and 3 - Tim's Preliminary General Conformity Comments

Fyi, Sara Laumann in Region 8 just sent me a general conformity determination for a BLM project taking place in Wyoming. The program staff in Region 8 sent the review to Sara and Tom Coda. Sara forwarded it to me because it had been given to Tom. I'm going to review behind Sara early next week. The schedule right now is that we need to have comments back to the Region 8 program staff by February 28.

I wasn't sure how much supervision you wanted to exercise over a project like this. Just let me know how you'd like to proceed.

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**From:** Laumann, Sara  
**Sent:** Wednesday, February 20, 2013 5:34 PM  
**To:** Bennett, Karen  
**Subject:** FW: NPL Project (SW Wyoming- BLM) review of Draft Chapters 2 and 3 - Tim's Preliminary General Conformity Comments

Hi Karen

I just received these today for review, and haven't yet looked this over, but wanted to share with you in the event you want to comment along with Tom.

Let me know if you do, comments welcome!  
Thanks,

Sara L. Laumann  
Associate Regional Counsel  
USEPA Region 8 - Office of Regional Counsel  
1595 Wynkoop Street  
Denver, CO 80202  
P: 303-312-6443  
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**From:** Russ, Timothy

**Sent:** Wednesday, February 20, 2013 1:33 PM

**To:** Laumann, Sara; Coda, Tom

**Cc:** Jackson, Scott; Razzazian, Christopher; Distler, Kenneth

**Subject:** NPL Project (SW Wyoming- BLM) review of Draft Chapters 2 and 3 - Tim's Preliminary General Conformity Comments

Hi Sara and Tom,

The Wyoming BLM has asked EPA to give a preliminary review of the drafts of Chapters 2 and 3 of the Naturally Pressurized Lance (NPL) project that would be located in southwest Wyoming in the Upper Green River Basin (UGRB) 8-hour (75 ppb) ozone NAAQS nonattainment area.

Chris Razzazian was kind enough to extract the relevant general conformity language from the drafts of Chapters 2 and 3 which is provided further below. I too reviewed the two chapters and

**Ex. 5 - Attorney Client**

(for reference, the .pdf files of both chapters are provided at the bottom of the email chain). I did prepare draft preliminary comments on the general conformity language and have included my review and those comments in the attached Word file below. In addition,

**Referred to BLM**

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Ex. 5 - Deliberative Process

## **Ex. 5 - Attorney Client**

I would very much appreciate if you folks could review my draft general conformity comments and provide any suggested edits/comments. Realizing that everyone's schedules are likely stacked with other competing requests, could I ask for any comments by Thursday, February 28<sup>th</sup>? Ken Distler of our NEPA program was able to negotiate an extension from BLM for comments, but to make this revised time frame I need to send comments to Ken by Monday, March 4<sup>th</sup>.

Hopefully this request can work for both your schedules and thanks in advance for the assistance!

Tim

Tim Russ  
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**From:** Russ, Timothy  
**Sent:** Tuesday, February 19, 2013 11:09 AM  
**To:** Razzazian, Christopher  
**Cc:** Jackson, Scott  
**Subject:** Fw: Conformity? - Fw: NPL review of chapter 2 alternative B and Chapter 3 - Tim's Preliminary General Conformity Comments

Hi Chris and Scott,

I have prepared a draft version of my potential comments for the BLM, but did not put them in the comment matrix as I would like feedback/suggestions first. Also, I believe we should run these general conformity comments by Tom Coda (OAQPS) and Sara Lauman (8ORC) before sending them on to BLM. Attached below are my preliminary comments:

<< File: Draft-BLM-NPL-General-Conformity-Comments-TJR-2-15-13.docx >>

Please note, that for my comment #3, that refers to/addresses the permitting of drilling rigs, under **Draft comments for section 3.2.2.2 General Conformity for Ozone**; please see the below attached .pdf file of Encana's "voluntary" drill rig permit:

<< File: 8122per.pdf >>

Please let me know if there are questions and to discuss.

Thanks!

Tim

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----- Forwarded by Tim Russ/R8/USEPA/US on 02/15/2013 12:33 PM -----

From: Christopher Razzazian/R8/USEPA/US  
To: Tim Russ/R8/USEPA/US@EPA  
Cc: Scott Jackson/R8/USEPA/US@EPA  
Date: 02/11/2013 12:01 PM  
Subject: Conformity? - Fw: NPL review of chapter 2 alternative B and Chapter 3

Hey Tim,

Per my request of a few minutes ago - here is the conformity language pasted out of their draft chapter 2, on page 2-5 and 2-6 (in case this format is too hard to read - as it is for me)

# Referred to BLM

Here's what they have from Chapter 3, page 3-5

# Referred to BLM

Thanks so much Tim!

Chris

----- Forwarded by Christopher Razzazian/R8/USEPA/US on 02/11/2013 11:55 AM -----

From: Kenneth Distler/R8/USEPA/US  
To: Christopher Razzazian/R8/USEPA/US@EPA  
Cc: Scott Jackson/R8/USEPA/US@EPA  
Date: 02/11/2013 10:25 AM  
Subject: Fw: NPL review of chapter 2 alternative B and Chapter 3

Chris, Attached find Chapters 2 (Alternatives) and 3(existing Conditions) of the preliminary DEIS for the NPL project. We only have 2 weeks for the review. Because of the short review time please limit your comments to more substantive elements (note one special area is general conformity)...Please have your comments back by Feb 20. Thanks.

Ken Distler  
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<< File: NPL\_Chapter%202\_Draft\_2013\_0208[1].pdf >> << File:  
NPL\_Chapter%203\_Draft\_2013\_0208[1].pdf >>